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14	UNITED STATES DISTRICT COURT		
15	EASTERN DISTRICT OF CALIFORNIA		
16	SACRAMENTO DIVISION		
17			
18	EDWIN L. HULLANDER,	CASE NO. 2:22-cv-01843-CKD	
19	Plaintiff,	JOINT STIPULATION AND ORDER TO CONTINUE TIME FOR INITIAL	
20	V.)	DISCLOSURES	
21	CAMPUS COMMONS PARK () CORPORATION, ()	Magistrate Judge: Carolyn K. Delaney [F.R.C.P. 26(a)(1)]	
22	Defendant.		
23 24	TO THE CLERK OF COURT:		
		ntiff') and Defendant CAMPUS COMMONS DADK	
25	Plaintiff EDWIN L. HULLANDER ("Plaintiff") and Defendant CAMPUS COMMONS PARK		
26	CORPORATION ("Defendant") (collectively, the "Parties") by and through their counsel, do hereby		
27	stipulate and respectfully apply to this Court for an Order continuing the dates for the Parties to exchange		
28	Initial Disclosures pursuant to Federal Rule of Civil Procedure ("FRCP") 26(a)(1) until 45 days after the		
	original deadline of April 1, 2023, to May 16, 2023:		
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<u>STIPULATION</u>

- 1. Plaintiff filed this action on October 17, 2022 (Dkt. No. 1) and served the Defendant with process on November 1, 2022.
 - 2. On January 6, 2023, Defendant filed its Answer. (Dkt. No. 8).
- 3. The Parties' Initial Disclosures pursuant to FRCP Rule 26(a)(1) are currently due on April 1, 2023. (Dkt. No. 12).
- 4. The Parties are presently engaged in comprehensive settlement communications and, for that reason, wish to stipulate to extend the time by which they must provide Initial Disclosures pursuant to FRCP Rule 26.
- 5. The Parties have agreed that postponing Initial Disclosures until **May 16, 2023,** would allow the Parties to avoid potentially unnecessary litigation costs and would encourage fruitful settlement discussions.
- 6. Now, therefore, IT IS HEREBY STIPULATED, between the Parties, subject to this Court's approval, that: the last date for the Parties to serve Initial Disclosures pursuant to FRCP Rule 26(a)(1), be continued until forty-five (45) days after the original deadline of April 1, 2023, to **May 16, 2023**.
- 7. This document is being electronically filed through the Court's ECF System. In this regard, counsel for Defendant hereby attests that (1) the content of this document is acceptable to all persons required to sign the document; (2) Plaintiff's counsel has concurred with the filing of this document; and (3) a record supporting this concurrence is available for inspection or production if so ordered.

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1	IT IS SO STIPULATED.	
2		Respectfully submitted,
3		O'TOOLE ROGERS, LLP
4	Date: March 28, 2023	By: /s/ Nicholas A. Rogers
5		NICHOLAS A. ROGERS MORGAN W. HANSEN
6		Attorneys for Defendant CAMPUS COMMONS PARK CORPORATION
7		ALLACCESS LAW GROUP
8	D . M 1 20 2022	
9	Date: March 28, 2023	By: /s/ Irakli Karbelashvili (as authorized on March 28, 2023) IRENE KARBELASHVILI
10		IRAKLI KARBELASHVILI Attorneys for Plaintiff
11		EDWIŇ L. HULLANDER
12		
13	ORDER	
14	For good cause shown, the above Stipulation is adopted as follows:	
15	The last date for the Parties to submit Initial Disclosures pursuant to FRCP Rule 26(a)(1) is	
16	hereby continued until forty-five (45) days after the original deadline of April 1, 2023, and will	
17	now be May 16, 2023.	
18	IT IS SO ORDERED.	
	Dated: March 30, 2023	Carop U. Delany
20		CAROLYN K. DELANEY UNITED STATES MAGISTRATE JUDGE
21		INITED STATES MADISTRATE JUDGE
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